

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

J.G. WENTWORTH SSC  
LIMITED PARTNERSHIP,

Plaintiff,

vs.

LINDA CALHOUN WILLIAMS,

Defendant.

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CASE NO. 1:01-cv-00192-HJW

JUDGE WEBER

**REPLY TO DEFENDANT'S  
MEMORANDUM IN OPPOSITION  
TO PLAINTIFF'S NOTICE OF  
ATTEMPT TO CIRCUMVENT THIS  
COURT'S JURISDICTION**

Defendant Linda Calhoun Williams' Brief is simply wrong. Linda Calhoun Williams, as Executor for the Estate of Ramona F. Calhoun (the "Estate"), represents all of the heirs to Ramona Calhoun's Will. Thus, any issue with regard to Plaintiff J.G. Wentworth SSC Limited Partnership's ("Wentworth") claim or the Estate's challenge to Wentworth's rights will be conclusively decided by this Court. Certainly, the key issue in the Will contest filed by Dustin Lee Calhoun, if not the only issue, is the validity of Wentworth's claims. Therefore, any review by the Probate Court on that issue would cause an unnecessary (and improper) re-litigation of the very issues tried before this Court. Wentworth does not ask this Court to interfere with the Probate Court's jurisdiction, but solely to decide the issues before it so that the claims of Dustin Lee Calhoun regarding Wentworth, which have already been tried in this Court, are not retried.

Respectfully submitted,

/s/ James S. Wertheim

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**Counsel for Plaintiff**

**J.G. Wentworth S.S.C. Limited Partnership**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2004, a true copy of the foregoing was served via regular U.S. mail, postage prepaid, on:

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/s/ James S. Wertheim  
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